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September 9, 2022

By eFile

Chief Magistrate Judge Cheryl L. Pollak United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Jeanne L. LaFrantz v. Diocese of Brooklyn, et al.;

Case No. 21-cv-04920-FB-CLP

Dear Magistrate Judge Pollak:

We represent defendant The Roman Catholic Diocese of Brooklyn, New York in the referenced matter. Pursuant to the Court's July 22, 2022 minute order, we write with the consent of counsel for all parties to provide the Court with the following status report. Defendants' motions to dismiss, which were fully briefed as of June 27, 2022, remain *sub judice*.

Discovery is ongoing. The parties have exchanged Rule 26(a)(1) initial disclosures. The parties have also exchanged document requests and interrogatories and all parties have served written responses to those discovery demands. Plaintiff has made an initial production of documents and intends to supplement that production to include, among other things, medical authorizations. Defendants' collection and review of potentially responsive documents is ongoing. The parties reserve all rights with respect to discovery issues, but are committed to attempting to resolve any issues that may arise before seeking the Court's intervention.

Respectfully,

Randall L. Morrison, Jr.

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cc: Counsel for all parties (via ECF)